UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

United States of America)	
)	
v.)	No. 1:21-cr-141-JL-01
)	
Angela Calderon Morales AKA)	
Manuela Navarrete)	

Indictment

The Grand Jury charges:

<u>COUNT ONE</u> [False Statements – 18 U.S.C. § 1001(a)(2)]

- 1. The "National Passport Center" is a facility operated by the United States

 Department of State, Bureau of Consular Affairs, for the filing, processing, and adjudication of

 United States Passport Applications (forms **DS-11**) and United States Passport Renewal

 Applications (forms **DS-82**), which are used to apply for passport renewals by mail. The

 National Passport Center is located at 207 International Drive, Portsmouth, New Hampshire.
- 2. Title 22, Code of Federal Regulations, Section 51.2 provides that a passport may be issued only to a United States national. Under Title 22, Code of Federal Regulations, Section 50.1(d), a national is a citizen of the United States or a noncitizen owing permanent allegiance to the United States. A non-citizen national is someone who was: (i) born in American Samoa or Swain's Island; (ii) found in American Samoa or Swain's Island at a young age; (iii) a child of a non-citizen United States national who meets certain physical presence or residence requirements; or (iv) born in the Commonwealth of the Northern Marianas Islands and opted to become a non-citizen national instead of a citizen of the United States. 8 U.S.C. §§ 1408, 1101(a)(29); Public Law 94 241 § 302.

3. The defendant, Angela Calderon Morales AKA Manuela Navarrete, was

neither a citizen nor a national of the United States.

4. In and around September 2016, in the District of New Hampshire and elsewhere,

the defendant,

Angela Calderon Morales AKA Manuela Navarrete,

in a matter within the jurisdiction of the United States Department of State, an agency of the

executive branch of the Government of the United States, knowingly and willfully made a

materially false, fictitious, and fraudulent statement and representation in connection with a

United States Passport Renewal Application (form DS-82). Calderon Morales executed the

passport renewal application, which was subsequently received at the National Passport Center.

To induce and secure the issuance of a United States Passport, Calderon Morales falsely stated

on the application a name, date of birth, and place of birth that were not her own. Calderon

Morales knew that this statement and representation was false when made.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

/s/ Foreperson

Grand Jury Foreperson

JOHN J. FARLEY

Acting United States Attorney

/s/ Anna Dronzek

Anna Dronzek

Assistant United States Attorney

Date: August 30, 2021

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